

JUDGE: Hon. J. Michael Seabright

RESPONSE IN OPPOSITION TO
DEFENDANT’S MOTION TO STAY

Come now the Plaintiffs, by and through counsel of record, and for their response to Defendant’s Motion to Stay (“the Motion”), show unto the Court the following:

Defendant filed her Motion to Stay Pending Appeal on August 31, 2021 [Docket # 113]. Plaintiffs oppose this Motion and rely on the arguments raised in the attached Memorandum in Opposition, the record, the Declaration of Counsel, the Declaration of Jon Abott, and any argument made if the Court requests a hearing on this matter. Because Defendant has wholly failed to make the requisite showing that she is entitled to a stay pending appeal, the Court should deny her Motion.

Respectfully submitted,

Dated: September 13, 2021.

/s/ Alan Alexander Beck
Alan Alexander Beck

/s/ Stephen D. Stamboulieh
Stephen D. Stamboulieh

Attorneys for Plaintiffs